

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

APPLICABLE HEARING DATE: June 12, 2019

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO**, as representative of the

COMMONWEALTH OF PUERTO RICO,

Debtor.

**ASOCIACIÓN PUERTORRIQUEÑA DE LA
JUDICATURA, INC.,**

Movant,

v.

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,**

as representative of the

COMMONWEALTH OF PUERTO RICO,

Respondent.

BANKRUPTCY NO. 17-3283
(CIVIL NO. 17-1578)

RE:

Puerto Rico Oversight, Management,
and Economic Stability Act
("PROMESA"),
Title III Petition for Adjustment of
Debts

**MOTION SUPPLEMENTING APJ'S MOTION TO LIFT STAY
AND SUBMITTING WHITE PAPER
ON JUDICIAL INDEPENDENCE**

TO THE HONORABLE COURT:

APPEARS NOW the Asociación Puertorriqueña de la Judicatura, Inc. ("APJ"), through the undersigned counsel, and hereby states, alleges, and requests as follows:

The APJ's Motion to lift stay is being restored to the Court's agenda for Wednesday, June 12, 2019 at the Omnibus Hearing. Among this critical issues to be discussed by APJ will be judicial independence. Since the original filing of the motion to lift stay, the American College of Trial Attorneys has issued a White Paper on this matter entitled: "The Need to Promote and Defend Fair and Impartial Courts" dated March 2019. Exhibit A. This is a sequel to a previous White Paper by the ACTL entitled: "Judicial Independence: A Cornerstone of Democracy Which Must Be Defended (2006)" Exhibit B. Both documents are being submitted in support of APJ's position in this litigation.

WHEREFORE, APJ, on behalf of and for its members, respectfully requests that this Honorable Court **GRANT** relief from the automatic stay, allowing APJ to continue its Declaratory Judgment action Civil No. 17-1580, currently pending in the District Court; and **NOTE** this supplementation.

CERTIFICATE OF SERVICE: I HEREBY CERTIFY that on this day, I electronically filed the foregoing motion with the Clerk of the Court using CM/ECF Filing System which will send notification to the parties and subscribed users.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of June 2019.

INDIANO & WILLIAMS, P.S.C.
207 del Parque Street; 3rd Floor
San Juan, P.R. 00912
Tel: (787) 641-4545; Fax: (787) 641-4544
david.indiano@indianowilliams.com
jeffrey.williams@indianowilliams.com

by: s/ David C. Indiano
DAVID C. INDIANO
USDC-PR NO. 200601

by: s/ Jeffrey M. Williams
JEFFREY M. WILLIAMS
USDC-PR No. 202414